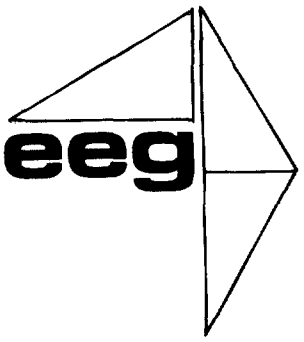

eeg enterprises, inc.

1 rome street • farmingdale, n.y. 11735 • 516-293-7472

November 24, 1997

William F. Caton, Secretary
1919 M Street, N.W. Room 222
Federal Communications Commission
Washington, DC 20554

Re: MM Docket No. 97-206

Dear Mr. Caton,

Enclosed are the original and eleven copies of EEG Enterprises, Inc.'s comments on the Notice of Proposed Rulemaking in the matter of Technical Requirements to Enable Blocking of Video Programming based on Program Ratings and Implementation of Sections 551(c), (d) and (e) of the Telecommunications Act of 1996. We apologize for the late timing of our comments and hope that the contents will prove beneficial to this endeavor.

Very truly yours,

EEG Enterprises, Inc.

Philip T. McLaughlin
Vice President

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Technical Requirements to Enable Blocking of Video Programming based on Program Ratings	)	ET Docket No. 97-206

To the Commission.

COMMENTS OF EEG ENTERPRISES, INC.

I. INTRODUCTION

EEG ENTERPRISES, INC. ("EEG") hereby responds to the Notice Of Proposed Rulemaking ("NPRM") adopted in this proceeding on September 25, 1997.

EEG is a member of the National Association of Broadcasters ("NAB"), the Consumer Electronics Manufacturers Association ("CEMA") of the Electronics Industries Association ("EIA") and a member of its Television Data Systems Subcommittee, R4.3. EEG has actively participated in the deliberations of R4.3 in its efforts to improve and expand the availability and usefulness of the Line 21 Closed Captioning system.

EEG has been producing hardware and software products in support of the Line 21 Closed Captioning system since 1979. We have been continuously active in the development of new standards and technologies in this area since that time. EEG has worked closely with CEMA and NAB in the development and testing of CEMA's

proposed Blocking system, and performed functional tests and statistical analysis supporting the feasibility of the system, under joint sponsorship of these associations. Additionally, EEG's Line 21 encoding technology has been utilized in all of the on-air tests conducted in Canada over the last several years as well as in the above referenced CEMA/NAB sponsored blocking technology tests.

II BLOCKING TECHNOLOGY STANDARD

The establishment of a Blocking technology Standard is a slow and deliberate process. The EIA, through the EIA 608, "Recommended Practice for Line 21 Data Service," has provided a universally accepted protocol for transmitting captioning and Extended Data Services ("XDS") in Line 21 of the vertical blanking interval ("VBI"). Included within the XDS data structure are packets that carry information about the current program such as program name and program rating. EEG has performed theoretical and empirical tests, under partial support from the EIA and NAB, that shows that XDS Program Rating codes can be sent in Line 21, Field 2 in a timely manner - even in the presence of field 2 captions and other XDS data. An effective receiver blocking implementation can be implemented based on these codes.

III MULTIPLE RATING SYSTEMS

As has been noted in the NPRM, the XDS Program Rating packet can be used to transmit multiple rating systems. Since its development this packet has been used to define at least two rating systems, MPAA and TV Ratings. In its most recent action the EIA has approved a change in the TV Ratings bit definitions that reflects the voluntary rating standards developed by the broadcast industry modified to include content based information. Provision has also been made for a third rating option as yet undefined. This standard permits only one of these rating systems to be in use for a given program.

EEG believes that it is essential that an effective television blocking system have certain features. It must be reliable, simple to understand, simple to use, consistent and cost effective. The voluntary standard incorporated within EIA 608 achieves these goals while reconciling disparate points of view.

If multiple rating systems are to be used it seems unlikely that program producers or broadcasters would provide ratings in all systems simultaneously, even if the transmission system allowed such a capability. The production of multiple ratings for a program would seem unduly burdensome to the broadcaster. Additionally, the broadcast industry has been adamantly and universally opposed to the use of multiple ratings systems.

If the broadcast provides only one of several possible rating systems, the television receiver would need to be able to block content at individually selected levels in each of the possible ratings systems. This would be extremely complex for the viewer to program

and would increase the cost of the television receiver. Leaving the door open to additional ratings systems would also significantly delay the design of blocking equipped sets since the methods for such expansion would have to be developed, specified and implemented before first product introduction. It is EEG's opinion that the inclusion of additional ratings systems is detrimental to the public interest. The additional complexity of the system would effectively deny the benefits of blocking technology to all but the most technically adept viewers and would significantly delay the delivery of this technology to the general public.

III PROGRAM BLOCKING IN DTV RECEIVERS

EEG feels that the use of the same rating system for NTSC and DTV receivers is the most practical approach and best serves the needs of the general public. Particularly we note that DTV delivered programming will sometimes be down-converted and viewed on NTSC receivers and recorded on NTSC VCRs. If the DTV ratings system is the same as is used in NTSC, the program rating can be converted directly to the Line 21 NTSC equivalent. If a different system is used this would not be possible. EIA/CEMA's proposed DTV captioning standard would in fact allow the transmission of the actual EIA 608 data bytes to facilitate such transmission of the ratings. It is EEG's view that the transmission of the field 2, line 21 XDS data stream containing the program ratings should be required to ensure that program ratings are readily available in down-converted signals. This data stream requires only 4 additional bytes of data per picture which is easily accommodated in the DTV data stream.

III VCR TECHNOLOGY AND PROGRAM BLOCKING

Our extensive experience in the recording, playback and decoding of Line 21 Closed Captioned data on consumer and professional recording equipment supports the commissions assertion that Line 21 encoded program rating data will still be effective for program blocking purposes on playback of pre-recorded material. Normal VCR technology cannot be used to defeat this system.

Respectfully submitted,

EEG ENTERPRISES, INC.

By _____
Philip T. McLaughlin, Vice President

1 Rome Street
Farmingdale, New York 11735
March 15, 1996